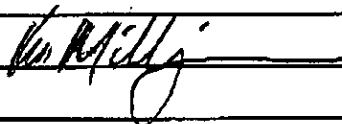




JACKSONVILLE, ARKANSAS 72078 P.O. Box 647 Ph. 982-0528

Pathfinder, Inc.

To: The Committee**Date:** 8 Feb 2005**Attn:** John Heyer**From:** Kenneth B. Milligan
Contract Services**Fax:** (703) 603-0655contract@pathfinderinc.org**Fax:** (501)982-1781**Phone:** (501)982-0528**Message:** RE: Docket No. 2004-01-01Mr. Heyer:Please consider our comments concerning
proposed rules by the Committee after removing
this cover sheet.Thank you,**CONFIDENTIAL INFORMATION**

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Total Pages (Including Cover) 2

A United Way Agency
Equal Opportunity Employer

Fax Cover Sht Ken.xls

Committee for Purchase from People
Who Are Blind or Severely Disabled
Attn: Docket No. 2004-01-01
1421 Jefferson Davis Highway
Jefferson Plaza 2, Suite 10800
Arlington, VA 22202-3259

Re: Docket No. 2004-01-01:
Comments of a Large Non-Profit Agency (NPA)

We represent a large NPA, which serves daily more than 900 people with disabilities and employees more than 120 people working on contracts under the JWOD Program.

We already comply with all aspects and intent of the proposed rules: from board policies and structure to independent auditing to executive compensation to avoidance of any conflict of interest. We are particularly attuned to public perception and oversight by NISH and the Committee and by the Commission on Accreditation of Rehabilitation Facilities (CARF).

What we object to is the apparent duplication and extra expense of out of cycle reporting. The extra expense of completing forms for the Committee which duplicates the IRS form 990 and other forms required by state government will be an added cost which takes monies away from direct care service. It will punish those for whom the jobs are created and leave the violators alone.

It seems the Committee is aiming all requirements at a small contingent of NPA's who may be giving the non-profit community a bad name. We suggest a complete re-write of the proposed regulations which allows the Committee the authority to further delve into the organizational makeup and policies of those NPA's who do not demonstrate compliance during the Committee's bi-annual compliance audits and leave alone the vast majority who willingly comply.

We appreciate the opportunity to comment.